

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RICHARD L. STONE and KIRBY
McINERNEY LLP,

Plaintiffs

Docket No: 08-CV-5171

- against -

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

EDWARD T. JOYCE; EDWARD T. JOYCE &
ASSOCIATES, P.C.; PAUL M. WEISS; FREED &
WEISS, LLC; JOHN RANDY PATCHETT and
PATCHETT LAW OFFICE

Defendants

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Roger Crane, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

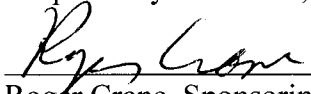
Applicant's Name: Michael H. Moirano
Firm Name: Nisen & Elliott
Address: 200 West Adams St., Suite 2500
City/State/Zip: Chicago, Illinois 60606
Phone Number: (312) 346-7800
Fax Number: (312) 346-9316

Michael H. Moirano is a member of good standing of the Bar of the State of Illinois. There are no pending disciplinary proceedings against Michael H. Moirano in any State or Federal court.

Dated: July 8, 2008

City, State: New York, New York

Respectfully submitted,



Roger Crane, Sponsoring Attorney
R/C 0469, SDNY Bar
Firm Name: Nixon Peabody
Address: 437 Madison Avenue
City/State/Zip: New York, NY 10022
Phone Number: 212-940-3000
Fax Number: 212-940-3111

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

RICHARD L. STONE and KIRBY
McINERNEY LLP,

Plaintiffs

- against -

EDWARD T. JOYCE; EDWARD T. JOYCE &
ASSOCIATES, P.C.; PAUL M. WEISS; FREED &
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Defendants

-----X

State of New York)
)
County of New York)

Docket No: 08-CV-5171

**AFFIDAVIT OF ROGER CRANE
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Roger Crane, being duly sworn, hereby deposes and says as follows:

1. I am Roger Crane of Nixon Peabody, counsel for Defendants, Edward T. Joyce and Edward T. Joyce & Associates, P.C., in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion to admit Michael H. Moirano as counsel pro hac vice to represent Defendants Edward T. Joyce and Edward T. Joyce & Associates, P.C. in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in August 1974. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Michael H. Moirano is a Partner at Nisen & Elliott.
4. I have found Mr. Moirano to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Michael H. Moirano, pro hac vice.
6. I respectfully submit a proposed order granting the admission of Michael H. Moirano, pro hac vice, which is attached hereto as Exhibit A.


WHEREFORE it is respectfully requested that the motion to admit Michael H. Moirano, pro hac vice, to represent Defendants Edward T. Joyce and Edward T. Joyce & Associates, P.C. in the above-captioned matter, be granted.

Dated: July 8, 2008

City, State: New York, New York

Notarized:

Respectfully submitted,



Roger Crane
RC 0469

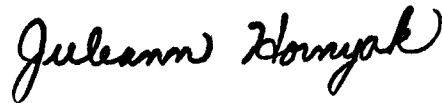
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Michael H. Moirano

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 5, 1979 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Friday, June 27, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

RICHARD L. STONE and KIRBY
McINERNEY LLP,

Plaintiffs

- against -

EDWARD T. JOYCE; EDWARD T. JOYCE &
ASSOCIATES, P.C.; PAUL M. WEISS; FREED &
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Defendants

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Docket No: 08-CV-5171

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Roger Crane, attorney for Defendants, Edward T. Joyce and Edward T. Joyce & Associates, P.C., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Michael H. Moirano
Firm Name:	Nisen & Elliott
Address:	200 West Adams St., Suite 2500
City/State/Zip:	Chicago, Illinois 60606
Phone Number:	(312) 346-7800
Fax Number:	(312) 346-9316
Email Address:	mmoirano@nisen.com

is admitted to practice pro hac vice as counsel for Defendants, Edward T. Joyce and Edward T. Joyce & Associates, P.C., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: July 8, 2008
City, State: New York, New York

Honorable Robert P. Patterson


CERTIFICATE OF SERVICE

This is to certify that on July 8, 2008, I caused a copy of the foregoing Motion To Admit Michael H. Moirano Pro Hac Vice, Affidavit of Roger Crane in Support of Motion to Admit Counsel Pro Hac Vice, Certificate of Good Standing and Proposed Order in the matter captioned as Richard L. Stone and Kirby McInerney LLP v. Edward T. Joyce, Edward T. Joyce & Associates, P.C., Paul M. Weiss, Freed & Weiss LLC, John Randy Patchett, and Patchett Law Office, CV-08-5171, to be served by U.S. Mail upon:

Peter S. Linden, Esq.
Kirby McInerney LLP
830 Third Avenue, 10th Floor
New York, New York 10022

Counsel for the Plaintiffs

Dated: July 8, 2008


Roger Crane
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(212) 940-3000